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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| | |
|------------------------|---|
| Proceeding | 91197666 |
| Party | Defendant United States Polo Association, Inc. |
| Correspondence Address | PATRICK M. TORRE KING AND SCHICKLI, PLLC 247 N BROADWAY LEXINGTON, KY 40507-1058 kmaynard@bakerlaw.com,gferguson@bakerlaw.com,rhorowitz@bakerlaw.com,ejoyce@bakerlaw.com,nydocketing@bakerlaw.com |
| Submission | Other Motions/Papers |
| Filer's Name | Kimberly M. Maynard/ |
| Filer's e-mail | kmaynard@bakerlaw.com, gferguson@bakerlaw.com, rhorowitz@bakerlaw.com, ejoyce@bakerlaw.com, nydocketing@bakerlaw.com |
| Signature | /Kimberly M. Maynard/ |
| Date | 11/07/2011 |
| Attachments | MOTION TO CONSOLIDATE.pdf (3 pages)(180392 bytes) |

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

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|------------------------|---|------------------------------|
| PRL USA HOLDINGS, INC. |) | |
| |) | |
| Opposer, |) | |
| |) | |
| against |) | Opposition Nos. 91197666 and |
| |) | 91197667 |
| |) | |
| UNITED STATES POLO |) | |
| ASSOCIATION, INC., |) | |
| |) | |
| Applicant. |) | |

MOTION TO CONSOLIDATE CASES

Applicant United States Polo Association ("Applicant") by and through its attorneys, Baker & Hostetler LLP, hereby moves the Trademark Trial and Appeal Board for an order that consolidates the above-referenced oppositions.

This request is made in good faith and for the purpose of saving time, effort, and expense. Oppositions to different applications owned by the same party may be joined in a consolidated opposition when appropriate. 37 C.F.R. § 2.104(b). The Board may order consolidation of pending cases involving common questions of law or fact. TBMP § 511. In this case, both Opposition No. 91197666 and Opposition No. 91197667 were initiated by the same party, Opposer PRL USA Holdings, Inc. Further, both Oppositions involve marks owned by Applicant and depicting multiple polo players which Applicant seeks to register with the U.S. Patent and Trademark Office. Finally, both of the contested Applications, and therefore both Oppositions, involve identical goods. Thus,

the commonalities arising between both Applications and both Oppositions raise issues that are substantially the same.

Consolidation of the Oppositions will be advantageous to both parties because it will result in less duplication of effort going forward. No prejudice or inconvenience would be caused by consolidation of the cases. Rather, consolidation would save both parties time, effort, and expense. Based on the foregoing, Opposer hereby respectfully requests that the Board issue an order that grants this motion to consolidate Opposition Nos. 91197666 and 91197667, and indicates the schedule that will govern the consolidated Opposition.

Dated: November 7, 2011

BAKER & HOSTETLER LLP


By: 
Gerald Ferguson

Robert B.G. Horowitz
Kimberly M. Maynard
45 Rockefeller Plaza
New York, New York 10111
(212) 589-4200
Attorneys for Applicant
United States Polo Association, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing motion was served on November 7, 2011 by first class mail, postage prepaid, in an envelope addressed to Opposer's counsel as follows:

G. Roxanne Elings, Esq.
Greenberg Taurig LLP
200 Park Avenue
New York, New York 10166



Kimberly M. Maynard